

## MAZIE SLATER KATZ & FREEMAN, LLC

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May 29, 2020

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### **VIA ELECTRONIC FILING**

Hon. Leda Dunn Wettre, U.S.M.J.  
United States District Court  
District of New Jersey  
M.L.K Jr. Federal Building & U.S. Courthouse  
50 Walnut St.  
Newark, NJ 07102

Re: Coello v. Estabrooks et al.  
Docket No.: 2:20-cv-1682-SDW-LDW

Dear Judge Wettre:

This firm represents plaintiff Coello in the above matter. This letter is submitted jointly on behalf of all counsel. First and foremost, all counsel wish to thank Your Honor for the time and attention during our initial conference on May 20, 2020. In follow up, all counsel participated in a meet and confer regarding the pending motion to dismiss filed by the Estabrooks Defendants and the forthcoming motion to dismiss of the Linden Defendants. Collectively, we propose the following briefing schedule:

- Defendants DiLeo, Scutari, Gerbounka and City of Linden shall file their motion to dismiss by June 11, 2020
- Plaintiff shall file a First Amended Complaint by July 2, 2020
- All Defendants to file an Amended Motion to Dismiss in response to Plaintiff's First Amended Complaint by July 23, 2020 \*which shall supersede and terminate defendants' prior motion to dismiss still pending
- Plaintiff's Opposition to the motions to dismiss to be filed by August 21, 2020
- Defendants' Reply Brief to be filed by September 4, 2020

- Return Date for Motions to Dismiss to be set by the Court

The reason for this briefing schedule is to allow plaintiff to address any pleading issues raised in Defendants' motions to dismiss that can be corrected by the filing of an Amended Complaint without the necessity and delay caused by the filing of a cross-motion seeking leave to amend the complaint. Counsel for the Defendants, Jeffrey Leonard, Esq. and Robert Varady, Esq. have consented to the filing of a First Amended Complaint by Plaintiff in accordance with this briefing schedule.

Respectfully submitted,



CORY J. ROTHBORT

cc: All Counsel of Record

*H:\MRM\COELLO-FIGUEROA\JUDGE WETTRE BRIEFING SCHEDULE 5-29-20.DOCX*

**SO ORDERED.**

*s/ Leda Dunn Wettre, U.S.M.J.*

**Dated:** 6/2/2020